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6 Attorneys for Defendants
7 UHS OF DELAWARE, INC. AND
VALLEY HEALTH SYSTEM, LLC
8

9 UNITED STATES DISTRICT COURT

10 DISTRICT OF NEVADA

12 GARY DAVIS and SCOTT SCRIBNER,

13 Plaintiffs,

14 v.

15 UNIVERSAL HEALTH SERVICES INC., a
16 Delaware Corporation; UHS OF DELAWARE,
17 INC., a Delaware Corporation; VALLEY
HEALTH SYSTEM, LLC, a Delaware Limited
Liability,

18 Defendants.

Case No. 2:21-cv-00008-RFB-VCF

**STIPULATION AND (PROPOSED)
ORDER TO EXTEND DISPOSITIVE
MOTIONS DEADLINES**

[FIRST REQUEST]

20 Pursuant to LR IA 6-1, 6-2, and LR 26-4, Defendants UHS OF DELAWARE, INC.
21 (“UHS”); and VALLEY HEALTH SYSTEM, LLC (“VHS”) (collectively “Defendants”), and
22 Plaintiffs GARY DAVIS and SCOTT SCRIBNER (“Plaintiffs”), by and through their undersigned
23 counsel, hereby stipulate to extend the dispositive motions deadlines, (ECF No. 43), by extending
24 the dispositive motions deadline for a period of thirty (30) days.

25 This is the first request for an extension to the dispositive motions’ deadline in this matter.
26 The requested extension is sought in good faith and not for purposes of undue delay. This request is
27 submitted at least twenty-one (21) days before each deadline set forth below.

28 The dispositive motion deadline is currently Wednesday, September 28, 2022. Counsel for

1 Defendants just completed a two-week federal jury trial and needs the additional time due to the
2 backlog that the trial caused. As such, good cause exists for this extension, and the parties stipulate
3 and agree that the dispositive motion deadline will be moved to **Friday, October 28, 2022**.

4 Accordingly, the parties agree that dispositive motions shall be due on October 28, 2022.
5 This request is not sought for any improper purpose or other reason of delay. No party is prejudiced
6 by the requested extension.

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8 Dated: September 7, 2022
9 Respectfully submitted,

10 */s/ Michael P. Balaban, Esq.*

11 MICHAEL P. BALABAN, ESQ.
12 LAW OFFICES OF MICHAEL P.
13 BALABAN

14 Attorneys for Plaintiffs
15 GARY DAVIS and SCOTT SCRIBNER

10 Dated: September 7, 2022
11 Respectfully submitted,

Kelsey Stegall

12 WENDY M. KRINCEK, ESQ.
13 KELSEY E. STEGALL, ESQ.
14 LITTLER MENDELSON, P.C.

15 Attorneys for Defendants
16 UHS OF DELAWARE, INC. and
17 VALLEY HEALTH SYSTEM, LLC

18 IT IS SO ORDERED.

RFB

19 RICHARD F. BOULWARE, II
20 UNITED STATES DISTRICT JUDGE

21 DATED this 8th day of September, 2022.
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